

UNITED STATES DISTRICT COURT

for the

Western District of Texas**FILED**

June 05, 2024

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS

United States of America

v.

CAMERON DARRICK PETERSON

BY: CM
DEPUTY

Case No. SA-24-MJ-839

Defendant(s)**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of May 31, 2024 in the county of COMAL in the
WESTERN District of TEXAS, the defendant(s) violated:*Code Section**Offense Description*

18 U.S.C. §§ 922(a)(6)

False Statement in Connection With Acquisition of a Firearm

Up to 10 Years Imprisonment, \$250,000 Fine, 3 Years Supervised
release, \$100 Mandatory Assessment

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT

☒ Continued on the attached sheet.*Complainant's signature*

John White, SA FBI

Printed name and title

- ☐ Sworn to before me and signed in my presence.
☒ Sworn to telephonically and signed electronically.

Date: June 5, 2024*Judge's signature*City and state: San Antonio, Texas

RICHARD B. FARRER, US MAGISTRATE JUDGE

Printed name and title

FILED

June 05, 2024

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

BY: CM
DEPUTY

UNITED STATES OF AMERICA,

Plaintiff,

V.

CAMERON DARRICK PETERSON

Defendant.

Case No. **SA:24-MJ-839**

COMPLAINT FOR VIOLATION OF:

18 U.S.C. §§ 922(a)(6) – False Statement in
Connection With Acquisition of a Firearm.

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, John White, a Special Agent with the Federal Bureau of Investigation, being duly sworn,
do hereby state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I make this affidavit in support of a criminal complaint charging **CAMERON DARRICK PETERSON**, hereinafter referred to as PETERSON, with violation of 18 U.S.C. §§ 922(a)(6) – False Statement in Connection With Acquisition of a Firearm.

2. I am a Special Agent with the Federal Bureau of Investigation and have been since 2018. I am currently assigned to the San Antonio Field Office where I investigate Domestic Terrorism violations. I have experience conducting federal criminal investigations, including drug trafficking, illegal firearms distribution, racketeering, Hobbs Act robbery, money laundering, crimes against children, violent gangs, and extortion. I have experience in interviewing and interrogation techniques, arrest procedures, surveillance, the execution of searches and seizures, Title III warrants, tasking confidential human sources, and various criminal laws and procedures. I am authorized to investigate violations of the laws of the United States and I am a law

enforcement officer with the authority to execute warrants issued under the authority of the United States.

3. This affidavit is being submitted for the limited purpose of obtaining a criminal complaint. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all my knowledge about this matter.

4. The statements in this affidavit are based on my investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that PETERSON committed a violation of 18 U.S.C. §§ 922(a)(6) – False Statement in Connection With Acquisition of a Firearm.

STATUTORY AUTHORITY

5. This investigation concerns the alleged violation of 18 U.S.C. §§ 922(a)(6). Title 18 U.S.C. §§ 922(a)(6) is a section of the United States Code that addresses criminal violations related to the acquisition of firearms. Specifically, it makes it unlawful for any person in connection with the acquisition or attempted acquisition of any firearm or ammunition from a license importer, manufacturer, dealer, or collector, knowingly to make any false or fictitious oral or written statement, or to furnish or exhibit any false, fictitious, or misrepresented identification, intended or likely to deceive such importer, manufacturer, dealer, or collector with respect to any fact material to the lawfulness of the sale or other disposition of such firearm or ammunition under the provisions of this chapter.

PROBABLE CAUSE

6. On May 8, 2024, an anonymous tipster, Internet Protocol address 146.241.175.95, submitted an online tip that was received by the FBI National Threat Operations Center regarding a potential school shooter in New Braunfels, Texas. The tipster reported that PETERSON has severe emotional issues, idolizes violence and school shootings, and that he may emulate infamous prior mass shooters. The tipster reported that he or she became aware of this information through PETERSON's girlfriend, who broke up with PETERSON for a short period of time. PETERSON's girlfriend told tipster that PETERSON discussed plans to commit mass shootings and kept a dozen or so journals where PETERSON detailed fantasies and plans for school shootings.

7. On January 4, 2024, PETERSON attempted a purchase of an RIA, model PF-14, serial number 40-01933, 12-gauge shotgun from Comal Pawn, located at 1105 W. San Antonio, New Braunfels, TX 78130. On that date, PETERSON completed an ATF background check form 4473. The form 4473 is required for the sale or transfer of firearms through a federally licensed firearms dealer (FFL). Form 4473 collects various information from the buyer and includes a background check component to ensure the buyer is legally eligible to purchase a firearm. PETERSON wrote that he resided at 1098 Carolyn Cove, New Braunfels, TX 78130. I know that 1098 Carolyn Cove is in fact PETERSON's current, correct residence. PETERSON was denied because of his age and the type of firearm he was attempting to purchase.

8. On May 21, 2024, an FBI Task Force Officer interviewed PETERSON at 1098 Carolyn Cove, New Braunfels, Texas. He stated that he smokes marijuana on a daily basis. FBI nominated PETERSON to be added to the National Instant Background Check System (NICS) prohibited persons list.

9. On May 31, 2024, PETERSON attempted a purchase of a Centurion Optio¹, serial number 23US-17, 12-gauge shotgun from Comal Pawn, located at 1105 W. San Antonio, New Braunfels, TX 78130. PETERSON completed the ATF form 4473. PETERSON wrote that he resided at 2980 Creek Bend Drive, New Braunfels, TX 78130. PETERSON also checked the box on the form 4473 denying that he was an unlawful user of marijuana. PETERSON was denied the purchase of the firearm pursuant to his name being entered onto the NICS prohibited person list.

10. On June 4, 2024, I interviewed property management staff at The Landings at Creekside, located at 2980 Creek Bend Drive, New Braunfels, TX 78130. They informed me that PETERSON had not resided at 2980 Creek Bend Drive, New Braunfels, TX 78130 since March 2023.

¹ The Form 4473 describes it as an “Optio-III^{II} II”. I believe this may be an error, as I have reviewed listings from firearms dealers offering “Optio-I” or “Optio-III” shotguns for sale. I believe the Roman numerals are meant to indicate different variants of similar shotguns made by the same manufacturer.

CONCLUSION

Based on the foregoing facts, I believe that Cameron Darrick PETERSON knowingly violated Title 18, United States Code, Section 922(a)(6).

Respectfully submitted,



John White
Special Agent
Federal Bureau of Investigation

Subscribed and sworn to before me on June 5, 2024



HONORABLE RICHARD B. FARRER
United States Magistrate Judge